

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

*Marinella Hemenway, et al. v. Islamic Republic of Iran*, No. 1:18-cv-12277 (GBD) (SN)

**NOTICE OF MOTION FOR LEAVE TO AMEND TO CORRECT ERRORS**

PLEASE TAKE NOTICE that Plaintiffs in the above-referenced matter, by undersigned counsel and in accordance with Fed. R. Civ. P. 15, respectfully request that this Court grant Plaintiffs' Motion for Leave to Amend to Correct Errors. No adverse parties have appeared in this proceeding, and the Clerk issued a Certificate of Default on August 13, 2019.

In support of this motion, Plaintiffs submit the following memorandum of law and a proposed order.

Dated: October 5, 2021

/s/ Jerry S. Goldman

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